

1 Jason P. Williams, Esq. (SBN 232371)  
2 WILLIAMS | PALECEK LAW GROUP, LLP  
3 3170 Fourth Ave., Suite 400  
4 San Diego, CA 92013  
5 Tel: (619)346-4263  
6 Fax: (619)346-4291  
7 Email: jwilliams@wplgattorneys.com  
8 *Attorneys for Clear Blue Insurance Company*

9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

**UNITED STATES BANKRUPTCY COURT**  
**NORTHERN DISTRICT OF CALIFORNIA**  
**SAN FRANCISCO DIVISION**

<p>In Re:</p> <p>PGE CORPORATION,</p> <p>and</p> <p>PACIFIC GAS AND ELECTRIC COMPANY,</p> <p>Debtors.</p> <hr/> <p><input type="checkbox"/> Affects PG&amp;E Corporation <input type="checkbox"/> Affects Pacific Gas and Electric Company <input checked="" type="checkbox"/> Affects both Debtors *All papers shall be filed in the Lead Case, No. 19-30088-DM.</p>	<p>Bankruptcy Case No. 19-30088 (DM) Chapter 11 (Lead Case) (Jointly Administered)</p> <p><b>DECLARATION OF LISA BUNNELL IN SUPPORT OF MOTION PURSUANT TO FED. R. BANKR. P. 9006(b)(1) TO DEEM CLAIM TIMELY FILED</b></p> <p>Date: May 27, 2020 Time: 10:00 a.m. Place: 450 Golden Gate Avenue, Ctrm 17 San Francisco, CA 94102 Judge: Hon. Dennis Montali Objection Deadline: May 20, 2020 4:00 p.m. (Pacific Time)</p>
---	--

I, Lisa Bunnell, hereby declare as follows:

1. I am over eighteen years of age, of sound mind, and fully-competent to make this declaration. All statements in this declaration are based on my own personal knowledge and observation and from my review of the court and business records in this case, or upon

1 information and belief as indicated. If called to testify on this matter, I can and would  
2 competently testify to the matters set forth in this Declaration.

3 2. Since July 22, 2019, I have been employed by North American Risk Services,  
4 Inc. ("**NARS**") as a Property Subrogation Adjuster. NARS is the third-party claims administrator  
5 for Clear Blue Insurance Company ("**Clear Blue**"). My role at NARS includes handling  
6 Property Subrogation matters.

7  
8 3. Clear Blue insures a limited number of individuals in California. Clear Blue  
9 issued two policies to homeowners made victims by the Camp Fire.

10 4. In my capacity as Property Subrogation Adjuster, I am responsible for  
11 subrogating the claims of homeowners. This includes the two claims that that are the subject of  
12 Clear Blue's Claim 88467. The homeowners whose losses are subject to Claim 88467 (as defined  
13 in the Motion) were not involved in litigation against the Debtors.

14 5. I do not recall seeing or receiving any notice of any claims bar date in the Debtors'  
15 bankruptcy cases. Upon my own volition, I came across an internet article concerning the  
16 Debtors' bankruptcy proceedings, and eventually of the claims bar date respective to subrogation  
17 insurers. Upon learning of the bar date, I reached out to counsel at Cozen O'Connor to prepare  
18 a proof of claim on Clear Blue's behalf.

19  
20 [CONTINUED BELOW]

21  
22 ////

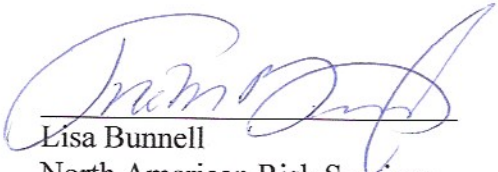
23  
24 ///

25  
26 ///

27  
28 ///

1 I declare under penalty of perjury pursuant to the laws of the United States of America  
2 and the State of California that the foregoing is true and correct to the best of my knowledge and  
3 belief.

4 Executed this 27<sup>th</sup> day of April 2020 in Port Orange, Florida.

5  
6  
7   
8 Lisa Bunnell  
9 North American Risk Services  
10 240 E, Central Parkway, Suite 4010  
11 Altamonte Springs, FL 32701  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28